EXHIBIT C

From:	Jay Schuffenhauer
To:	z/Meta-Kadrey; Dunning, Angela L.
Cc:	Llama C-Counsel
Subject:	RE: Kadrey v. Meta: Notice re: Claw Back of Meta_Kadrey_00093499 & Duplicates
Date:	Friday, December 6, 2024 12:40:34 PM

Counsel,

We have sequestered the five below-referenced documents pursuant to Rule 26(b)(5)(B). That said, and as we stated on the record, Plaintiffs do not agree that these documents are attorney-client privileged and intend to raise Meta's privilege designation with the Court. We also intend to raise with the Court Meta's assertion of privilege over the April 2023 decision to pause third-party licensing efforts with publishers. This issue arose frequently in Mr. Choudhury's deposition, both in his 30(b)(1) and 30(b)(6) capacities.

We believe yesterday's live discussions during Mr. Choudhury's deposition function as the meet-and-confer, and we will send our section of a letter brief on Monday addressing both privilege issues that arose during that deposition. If Meta disagrees, please offer times later today for a meet-and-confer on these issues.

Best,
Jay

From: Poppell, Cole A <CPoppell@cooley.com>
Sent: Thursday, December 5, 2024 3:34 PM
To: Llama C-Counsel <llama_cocounsel@bsfllp.com>
Cc: z/Meta-Kadrey <zmetakadrey@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>
Subject: Kadrey v. Meta: Notice re: Claw Back of Meta_Kadrey_00093499 & Duplicates

CAUTION: External email. Please do not respond to or click on links/attachments unless you recognize the sender.

Counsel,

As you know, during the deposition of Sy Choudhury today, the document Bates numbered **Meta_Kadrey_00093499** was identified to contain unredacted privileged communications, and Meta's counsel promptly gave Plaintiffs notice and clawed the document back from production while on the record. Plaintiffs' Counsel, Maxwell Pritt, while maintaining an objection, affirmed Plaintiffs would comply with Federal Rule of Civil Procedure 26(b)(5)(B) and sequester the document.

As a follow-up, Meta hereby provides written notice that this document and its duplicates, identified by Bates numbers below, contain unredacted privileged content and were produced inadvertently:

1. **Meta_Kadrey_00093499** and

Duplicates:

2. **Meta_Kadrey_00079969**
3. **Meta_Kadrey_00093389**
4. **Meta_Kadrey_00093430**
5. **Meta_Kadrey_00093446**

Pursuant to Fed. R. Civ. Pro. Rule 26(b)(5)(B), we ask that you refrain from reviewing or using these documents for any purpose and further ask that Plaintiffs promptly return, sequester, or destroy any copies of these documents or the material contained therein. Meta will reproduce such documents with appropriate redactions in due course.

<u>Please confirm in writing by reply email once this has occurred</u>.

Please also confirm that these documents were not shared, if at all, outside of Plaintiffs' counsel, and if they were shared (e.g., with a disclosed expert or consultant) that you have requested return or destruction from any person with whom they were shared.

We look forward to your prompt response.

Regards,
Cole

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